

The Premier NeuroSpine Institute website and its interactive properties (“Website”) is delivered, owned, operated, and distributed by Premier NeuroSpine Institute (referred to in this Privacy Notice as “Company” or “we” and through similar words such as “us,” “our,” etc.). This Privacy Notice outlines the personal information that Company may collect, how Company uses and safeguards that information, and with whom we may share it.

THIS WEBSITE IS OFFERED FROM THE UNITED STATES (“US”). IN PARTICULAR, IT IS NOT INTENDED FOR USE IN THE EUROPEAN UNION (“EU”). For individuals located outside of the US, please note that Company is a US-based company. If you use the Website, all information, including personal information, will be transferred to Company in the US and used as described in this Privacy Notice.

Company encourages our customers, visitors, business associates, and other interested parties to read this Privacy Notice, which applies to all users. By using our Website or submitting personal information to Company by any other means, you acknowledge that you understand and agree to be bound by this Privacy Notice, and agree that Company may collect, process, transfer, use, and disclose your personal information as described in this Privacy Notice. IF YOU DO NOT AGREE WITH ANY PART OF THIS PRIVACY NOTICE, PLEASE DO NOT USE OUR WEBSITE.

What personal information do we collect about you?

Personal information (also commonly known as personally identifiable information (PII) or personal data) is information that can be used to identify you, or any other individual to whom the information may relate. We collect the following information directly from you when you submit such information to the Website:

Name and Contact Information (e.g. address, phone number, email, fax);

Billing Information (e.g. credit card, bank account, billing contact information);

Company/Employer Information;

Geographic or Location Information; and

Other information that may be exchanged in the course of engaging with the Website. You will be aware of any subsequently collected information because it will come directly from you.

When you provide personal information to Company as described in this Privacy Notice, that personal information is collected directly from you, and you will know the precise personal information being collected by us. This includes personal data you provide when you register for our website, request information regarding our services, request that we send you marketing, request customer support, sign up to an event such as a webinar or conference, or give us feedback or contact us.

We may also receive personal data about you from third parties from whom we purchase personal data or collect from publicly available information. The personal data we collect from other sources includes identifiers, professional or employment-related information, education information, visual information, internet activity information, and inferences about preferences and behaviors.

In particular, we collect personal data from the following sources: Third party providers of business contact information, including mailing addresses, job titles, email addresses, phone numbers, intent data (or user behavior data), IP addresses, social media profiles, LinkedIn URLs and custom profiles, for purposes of targeted advertising, delivering relevant email content, event promotion and profiling, determining eligibility, and verifying contact information; and other individuals at your organization who may provide us with your contact details for the purposes of obtaining services.

Cookies, Device Data, and How it is Used

When you use our Website, we may record unique identifiers associated with your device (such as the device ID and IP address), your activity within the Website, and your network location.

Company uses aggregated information (such as anonymous user usage information, cookies, IP addresses, browser type, clickstream information, etc.) to improve the quality and design of the Website and to create new features, promotions, functionality, and Websites by storing, tracking, and analyzing user preferences and trends. Specifically, we may automatically collect the following information about your use of our Website through cookies, web beacons, and other technologies:

- Domain name;

- browser type and operating system;

- web pages you view;

- links you click;

- IP address;

- the length of time you visit the sites, portals, and/or websites; and

- the referring URL or the webpage that led you to the sites.

We may also collect information regarding application-level events, such as crashes, and associate that temporarily with your account to provide customer service. In some circumstances, we may combine this information with personal information collected from you (and third-party Website providers may do so on behalf of us).

In addition, we may use “cookies,” clear gifs, and log file information that help us determine the type of content and pages to which you link, the length of time you spend at any particular area of the Website, and the portion of the Website you choose to use. A cookie is a small text file that is sent by a website to your computer or mobile device where it is stored by your web browser. A cookie contains limited information, usually a unique identifier and the name of the site. Your browser has options to accept, reject or provide you with notice when a cookie is sent. Our cookies

do not execute any code or virus; and they do not contain any personal information. Cookies allow Company to serve you better and more efficiently, and to personalize your experience with the Website. We may use cookies for many purposes, including (without limitation) to save your password so you don't have to re-enter it each time you visit the Website, and to deliver content (which may include third party advertisements) specific to your interests.

The Website uses three types of cookies: those that are strictly necessary for the operation of the website, those that are used for analytics, and those that are used for marketing and advertising. By using the Website, you accept the use of all cookies. Strictly necessary cookies remember your preferences and are intended to make your experience on the Website better. Analytics cookies are used for performance measurement to understand things like how many people visit the Website, how they navigate it, and what content is popular. Advertising cookies enable us and our advertising partners to deliver relevant advertisements that we think will be of interest to you. These cookies record your visit to our website and the content you interact with, and may also be used to manage how often you see an advertisement and which ones you see. They may be placed by us or by our partners with our permission.

We may use third party Website providers to help us analyze certain online activities and/or to analyze aggregated data provided by customers. For example, these Website providers may help us measure the performance of our online campaigns or analyze visitor activity on the Website. We may permit these Website providers to use cookies and other technologies to perform these services for Company. We do not share any personal information about our customers with these third-party Website providers, and these Website providers do not collect such information on our behalf. Our third-party Website providers are required to comply fully with this Privacy Notice.

Collection of User Generated Content

We may invite you to post content on the Website, including your comments and any other information that you would like to be available on the Website, which may become public ("User Generated Content"). If you post User Generated Content, all of the information that you post will be available to authorized personnel of Company and may be made publicly available. You expressly acknowledge and agree that we may access in real-time, record and store archives of any User Generated Content on our servers to make use of them in connection with the Website. If you submit a review, recommendation, endorsement, or other User Generated Content through the Website, or through other websites including Facebook, Instagram, Google, Yelp, and other similar channels, we may share that review, recommendation, endorsement or content publicly on the Website.

How does Company use personal information?

Subject to the terms of this Privacy Notice, Company uses the above-described categories of personal information in several ways. Unless otherwise stated specifically, the above information may be used for any of the following purposes:

- To respond to your requests;
- to distribute communications relevant to your use of the Website, such as system updates or information about your use of the Website;
- as may be necessary to support the operation of the Website, such as for billing, account maintenance, and record-keeping purposes;
- to send to you Company solicitations, product announcements, and the like that we feel may be of interest to you (you may “opt out” of receiving these marketing materials); and
- in other manners after subsequent notice is provided to you and/or your consent is obtained, if necessary.

Company does not sell, re-sell, or distribute for re-sale your personal information. Aggregated information may be used internally and by third-party Website providers in order to improve the Website as described below.

How do we share your personal information with third parties?

We may provide any of the described categories of personal information to Company employees, consultants, or affiliates for any purpose permitted under this Privacy Notice, or to other third-party businesses or persons for the purpose of processing such information on our behalf in order to maintain the Website. In such circumstances, we require that these parties agree to protect the confidentiality of such information consistent with the terms of this Privacy Notice.

We will share your personal data with our contracted service providers who provide services such as IT and system administration and hosting, credit card processing, research and analytics, marketing, customer support, and data enrichment.

We share your personal data with the companies that we acquire in the future after they are made part of our organization, to the extent such sharing of data is necessary to fulfil a request you have submitted via our Website or for customer support, marketing, technical operations, and account management purposes.

We may also share personal data with third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

If you attend an event, conference, or webinar organized by us, or download or access an asset on our Website, we may share your personal data with sponsors of the event. If required by applicable law, you may consent to such sharing via the registration form. In these circumstances, your information will be subject to the sponsors’ privacy statements. If you do not wish for your information to be shared, you may choose to not opt-in via event/webinar registration.

If you use the Website or our services as an authorized user of one of our customers, we may share your personal data with our customer responsible for your access to the services to the extent this is necessary for verifying accounts and activity, investigating suspicious activity, or enforcing our terms and policies.

In individual instances, we may share your personal data with professional advisers acting as service providers, processors, or joint controllers – including lawyers, bankers, auditors, and insurers based in countries in which we operate who provide consultancy, banking, legal, insurance and accounting services, and to the extent we are legally obliged to share or have a legitimate interest in sharing your personal data.

We will not share your personal information with other, third-party companies for their commercial or marketing use without your consent for which you have the ability to opt-in or opt-out. We may share aggregated data with third-party Website providers in order to improve the Website as described below.

In addition, we may release personal information: (i) to the extent we have a good-faith belief that such action is necessary to comply with any applicable law; (ii) where our records indicate fraudulent activity or other deceptive practices that a government agency should be made aware of; (iii) to enforce any of our legal rights, protect ourselves against any liability, defend ourselves against any claims, protect the rights, property and personal safety of any user, or protect the public welfare; (iv) when disclosure is required to maintain the security and integrity of the Website, or to protect any user's security or the security of other persons, consistent with applicable laws; (v) to respond to a court order, subpoena, search warrant, or other legal process, to the extent permitted and as restricted by law; or (vi) in the event that we go through a business transition, such as a merger, divestiture, acquisition, liquidation or sale of all or a portion of our assets.

Retention of Data

Company will retain your personal information unless we receive a request from you to delete such information. We will retain and use personal information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, or enforce our legal agreements and policies.

Company will also retain usage data for internal analysis purposes as described in “Cookies, Device Data, and How it is Used” above. Usage data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of the Website, or we are legally obligated to retain this data for longer periods.

International Data Transfer

If you are located outside the United States, in particular if you are located in Switzerland, the United Kingdom, or the European Economic Area (“EEA”), please note that we and our servers are located in the United States. Company does not market to or solicit customers from outside the US, or do business outside of the US, therefore, users of the Website should not expect to avail themselves of the rights provided under the EU’s General Data Protection Regulation (“GDPR”). If you use the Website, all information, including personal information, will be transferred to Company in the US. By using the Website, you unambiguously consent to the transfer of your personal information and other information to the US and elsewhere for the purposes and uses described in this Privacy Notice. Further, you acknowledge that Company is not subject to the GDPR or similar international privacy laws, and, therefore, you will be unable to claim the privacy rights provided in those laws.

California Privacy Rights

If you are a California resident, California law may provide you with certain rights with regard to your personal information under the CCPA. Throughout this Privacy Notice you will find information required by CCPA regarding the categories of personal information collected from you, the purposes for which we use personal information, and the categories of third parties your data may be shared with. This information is current as of the date of this Privacy Notice and is applicable in the 12 months preceding the effective date of this Privacy Notice.

As a California resident, the CCPA provides you with the ability to make inquiries regarding your personal information. Specifically, to the extent that the information is not already provided in this Privacy Notice, you have the right to request disclosure about the collection and use of your personal information over the past 12 months, including:

- The categories of personal information collected about you.
- The categories of sources for the personal information collected about you.
- The business or commercial purpose for collecting your personal information.
- The categories of third parties with whom your personal information was shared.
- The specific pieces of personal information collected about you.

If your personal information was disclosed for a business purpose, the personal information categories disclosed and the categories of third parties to which the information was disclosed.

If your personal information was sold in the past 12 months, the personal information categories sold and the categories of third parties to which the information was sold (Note: COMPANY DOES NOT SELL YOUR PERSONAL INFORMATION).

Please note that you may only make the above requests twice in a 12-month period. You also have the right to request that any of your personal information collected and retained be deleted, subject to certain exceptions. Finally, you have the right to exercise any of the rights provided under the CCPA without being subject to discriminatory treatment by Company or any business.

You may submit a request regarding your rights under CCPA by contacting us at one of the following: clinichelp@pni.health or our office phone number at 727-605-1770.

If we receive a CCPA request from you, we will first make a determination regarding the applicability of the law, and we will then take steps to verify your identity prior to responding. The steps to verify your identity may vary based on our relationship with you, but, at a minimum, it will take the form of confirming and matching the information submitted in the request with information already held by Company and/or contacting you through previously used channels to confirm that you submitted the request (i.e. confirming identity through contact information that we have on file, not the contact information submitted to make the request).

Your rights as stated here can also be exercised by an authorized agent on your behalf. Company will follow the standards set by the State of California Attorney General regarding designation of an authorized agent to exercise rights under the CCPA. You may review information available through the Attorney General website (<https://www.oag.ca.gov/privacy/ccpa>) regarding how an individual can be designated as an authorized agent under the CCPA.

In addition to the CCPA, California Civil Code Section 1798.83 permits users of the Website who are California residents to request certain information regarding its disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please contact us as described above.

Third Party Advertisers

We may allow other companies, called third-party ad servers or ad networks, to serve advertisements within the Website. These third-party ad servers or ad networks use technology to send, directly to your device, the advertisements and links that appear on the Website. They automatically receive your device ID and IP address when this happens. They may also use other technologies (such as cookies, JavaScript, or Web Beacons) to measure the effectiveness of their advertisements and to personalize the advertising content you see. You should consult the respective privacy policies of these third-party ad servers or ad networks for more information on their practices and for instructions on how to opt-out of certain practices. This Privacy Notice does not apply to them, and we cannot control their activities.

Information Security and User Responsibility

Company employs industry-standard security measures designed to protect the security of all information submitted through the Website. However, the security of information transmitted through the internet or via a mobile device can never be guaranteed. We are not responsible for any

interception or interruption of any communications through the internet or for changes to or losses of data.

Users of the Website are responsible for maintaining the security of any password, user ID or other form of authentication involved in obtaining access to password protected or secure areas of the Website. In order to protect you and your information, we may suspend your use of the Website, without notice, pending an investigation, if any breach of security is suspected.

Protected Health Information

Any use of Protected Health Information (PHI), as defined under the Health Insurance Portability and Accountability Act (“HIPAA”), requires express prior consent and will never be used beyond its intended and stated use. For more information, please refer to our Responsible and Ethical AI Notice.

External Links

The Website may contain links to other websites maintained by third parties. Please be aware that we exercise no control over linked sites and Company is not responsible for the privacy practices or the content of such sites. Each linked site maintains its own independent privacy and data collection policies and procedures, and you are encouraged to view the privacy policies of these other sites before providing any personal information.

You hereby acknowledge and agree that Company is not responsible for the privacy practices, data collection policies and procedures, or the content of such third-party sites, and you hereby release Company from any and all claims arising out of or related to the privacy practices, data collection policies and procedures, and/or the content of such third-party sites.

Children’s Privacy

The Website is not intended for children under the age of 18, and Company does not knowingly collect the personal information of children under the age of 18.

Changes to this Privacy Notice

Company reserves the right to modify this Privacy Notice from time to time in order that it accurately reflects the regulatory environment and our data collection principles. When material changes are made to this Privacy Notice, Company will post the revised Privacy Notice on our Website.

Contact Us

If you have any questions or comments about this Privacy Notice or the Website provided by Company, please contact us at: clinichelp@pni.health

Additional Assistance

If you would like this Privacy Notice in another format (e.g. audio, large print) please contact us (see “Contact Us” above).